

# Exhibit 28

**From:** Ernest Herrera  
**To:** Disher, Todd  
**Cc:** Nina Perales; Bitter, Adam; Denise M. Hulett; rachel.apter@njoag.gov; jeremy.hollander@law.njoag.gov; kenneth.levine@law.njoag.gov; Celina Moreno; jeffrey.robins@usdoj.gov; Alejandra Avila; Biggs, Adam; Starr, Brantley; Peroyea, Trent; Goldsmith, Aaron (CIV)  
**Subject:** RE: Texas, et al. v. United States, et al. - Dr. Perryman's Supporting Documents  
**Date:** Tuesday, July 03, 2018 4:45:04 PM  
**Attachments:** DACA TEXAS FISCAL ESTIMATES.pdf

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Todd:

Here are the calculations of costs and benefits by Dr. Perryman that you requested.

Happy 4th!

Ernest I. Herrera

-----Original Message-----

From: Disher, Todd [mailto:Todd.Disher@oag.texas.gov]  
Sent: Friday, June 29, 2018 7:09 AM  
To: Ernest Herrera; Nina Perales; Bitter, Adam; Denise M. Hulett; rachel.apter@njoag.gov; jeremy.hollander@law.njoag.gov; kenneth.levine@law.njoag.gov; Celina Moreno; jeffrey.robins@usdoj.gov; Alejandra Avila; Biggs, Adam; Starr, Brantley; Peroyea, Trent; Goldsmith, Aaron (CIV)  
Subject: RE: Texas, et al. v. United States, et al. - Dr. Perryman's Supporting Documents

Nina and Ernest,

Please send us the declaration for Mr. Kerlikowske and his supporting expert documents today as soon as possible. Also, did you confirm with Dr. Perryman that we will receive his calculations of DACA's costs and benefits before the July 4 holiday?

Thank you,

Todd

Todd Lawrence Disher  
Special Counsel for Civil Litigation  
Office of the Attorney General of Texas  
P.O. Box 12548 (MC 001)  
Austin, TX 78711-2548  
(512) 936-2266  
Todd.Disher@oag.texas.gov

-----Original Message-----

From: Disher, Todd  
Sent: Wednesday, June 27, 2018 11:04 PM  
To: 'Ernest Herrera' <eherrera@MALDEF.org>; Nina Perales <nperales@MALDEF.org>; Bitter, Adam <Adam.Bitter@oag.texas.gov>; Denise M. Hulett <Dhulett@MALDEF.org>; rachel.apter@njoag.gov; jeremy.hollander@law.njoag.gov; kenneth.levine@law.njoag.gov; Celina Moreno <cmoreno@MALDEF.org>; jeffrey.robins@usdoj.gov; Alejandra Avila <Aavila@MALDEF.org>; Biggs, Adam <Adam.Biggs@oag.texas.gov>; Starr, Brantley <Brantley.Starr@oag.texas.gov>; Peroyea, Trent <Trent.Peroyea@oag.texas.gov>; Goldsmith, Aaron (CIV) <Aaron.Goldsmith@usdoj.gov>  
Subject: RE: Texas, et al. v. United States, et al. - Dr. Perryman's Supporting Documents

Thank you, Ernest. Please confirm that you will produce the documents before the July 4 holiday.

Todd

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-----Original Message-----

From: Ernest Herrera [mailto:eherrera@MALDEF.org]  
Sent: Wednesday, June 27, 2018 7:02 PM  
To: Disher, Todd <Todd.Disher@oag.texas.gov>; Nina Perales <nperales@MALDEF.org>; Bitter, Adam <Adam.Bitter@oag.texas.gov>; Denise M. Hulett <Dhulett@MALDEF.org>; rachel.apter@njoag.gov; jeremy.hollander@law.njoag.gov; kenneth.levine@law.njoag.gov; Celina Moreno <cmoreno@MALDEF.org>; jeffrey.robins@usdoj.gov; Alejandra Avila <Aavila@MALDEF.org>; Biggs, Adam <Adam.Biggs@oag.texas.gov>; Starr, Brantley <Brantley.Starr@oag.texas.gov>; Peroyea, Trent <Trent.Peroyea@oag.texas.gov>; Goldsmith, Aaron (CIV) <Aaron.Goldsmith@usdoj.gov>  
Subject: RE: Texas, et al. v. United States, et al. - Dr. Perryman's Supporting Documents

Yes, we will produce them as soon as Dr. Perryman can extract them, as he described. His assistant who manages those data is on vacation at the moment, so it may not happen this week.

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From: Disher, Todd [Todd.Disher@oag.texas.gov]  
Sent: Wednesday, June 27, 2018 6:40 PM  
To: Ernest Herrera; Nina Perales; Bitter, Adam; Denise M. Hulett; rachel.apter@njoag.gov; jeremy.hollander@law.njoag.gov; kenneth.levine@law.njoag.gov; Celina Moreno; jeffrey.robins@usdoj.gov; Alejandra Avila; Biggs, Adam; Starr, Brantley; Peroyea, Trent; Goldsmith, Aaron (CIV)  
Subject: Texas, et al. v. United States, et al. - Dr. Perryman's Supporting Documents

Ernest,

Please confirm that you are going to produce Dr. Perryman's estimates of the total costs and total benefits related to his cost-benefit analysis of the DACA population. Those numbers formed the basis of Dr. Perryman's opinions expressed in his declaration, in particular his conclusions contained in Paragraph 39. Dr. Perryman confirmed that he can produce that information, and that information is responsive to Plaintiff States' requests for production.

Todd

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**ESTIMATED ANNUAL NET FISCAL BENEFITS OF DACA RECIPIENTS IN TEXAS**

	<b>Federal</b>	<b>State</b>	<b>Local</b>	<b>Total</b>
<b>Direct Benefit</b>	\$689,550,521	\$422,701,412	\$249,455,516	\$1,361,707,450
<b>Indirect and Induced Net</b>	\$1,640,661,256	\$1,083,841,205	\$515,435,131	\$3,239,937,592
<b>Direct Costs</b>	(\$242,128,726)	(\$250,007,800)	(\$533,661,055)	(\$1,025,797,581)
<b>Net Total</b>	\$2,088,083,051	\$1,256,534,817	\$231,229,593	\$3,575,847,461

\*The Indirect and Induced Net Benefit estimate includes the spillover effects associated with both the Direct and Induced Net Benefits.  
the Direct Costs.

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